

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,  
  
Plaintiff,  
  
v.  
  
UNIVERSITY OF WASHINGTON,  
  
Defendant.

No. 2:17-cv-00642-RSM

STIPULATED MOTION TO EXTEND  
THE DISCOVERY AND DISCOVERY  
MOTION DEADLINE

NOTED ON MOTION CALENDAR:  
October 25, 2017

**I. RELIEF REQUESTED**

The parties hereby request the Court grant their stipulated motion to extend the discovery motion deadline from October 27, 2017 to November 17, 2017, and the discovery cutoff from November 27, 2017 to December 19, 2017. The parties do not believe it is necessary to change any other deadlines at this time.

**II. STATEMENT OF FACTS**

The parties met and conferred pursuant to FRCP 26 on October 23, 2017, regarding Plaintiff's first two sets of interrogatories and requests for production of documents. *Chen Decl.*, at ¶ 2. While the discussion was productive, the parties were unable to agree regarding *at least* a majority of the items in dispute. *Id.*

Defendant filed a motion for summary judgment on August 24, 2017, that is currently pending. The parties, therefore, agree to stipulate to extending the discovery cutoff and discovery motions deadline. *Id.*

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### III. ISSUE STATEMENT

Should the Court extend the discovery motions deadline and discovery cutoff deadline less than a month where there is a pending motion for summary judgment and where the parties have mutually agreed to do so?

### IV. EVIDENCE RELIED UPON

- Declaration of Derek Chen

### V. ARGUMENT AND AUTHORITY

Pursuant to WDLCR 7(d)(1) and 10(g), the parties respectfully request the Court extend the discovery motion deadline from October 27, 2017 to November 17, 2017, and the discovery cutoff from November 27, 2017 to December 19, 2017. While the parties understand these motions are generally disfavored, the defendant believes there is sufficient cause for these short extensions.

Defendant filed a motion for summary judgment to dismiss all claims roughly two months ago, and the parties believe the Court will rule on this motion soon. The Court's ruling will possibly narrow the scope of the discovery disputes between the parties. This will likely significantly conserve both the parties' resources as well as the Court's resources if court intervention is necessary. Therefore, judicial economy as well as conservation of resources strong favors these short extensions.

In addition, the requested extensions are less than a month. The proposed extensions do not move the trial date or any other part of the case schedule. The unique circumstances of this situation are such that the short extension has the potential to significantly clarify current disputes as well as conserve resources. Neither party will be prejudiced by this extension.

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 25, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

**Attorneys for Pro-Se Plaintiff**

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DATED: October 25, 2017

/s/ Derek C. Chen

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STIPULATED MOTION TO EXTEND THE DISCOVERY  
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